

EXHIBIT A



Subpoenas and non-opposition to ex parte motion

5 messages

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Thu, Nov 21, 2024 at 1:58 PM

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Hello,

Thank you for the call earlier.

Regarding the ex parte request: So long as Jurisdictional Defendants have a basis to request that the motion to release funds be decided on an emergency basis and without a hearing, Claimants have no opposition. We do still oppose the substance of the motion, but we are not opposed to it being decided on an emergency basis and without a hearing.

Regarding the subpoenas -- I wanted to try again to explain the relevance of the subpoenas. We need transactional records from Stripe, Total Apps, Hubspot, and Intuit (as well as accounting records from Intuit) because that is the only way for us to continue our asset tracing efforts. For example, we have records showing that Jurisdictional Defendants made transfers to Stripe accounts, but we cannot see where that money ended up -- i.e., where Stripe sent the money -- until we have the Stripe transaction records. To the extent the subpoena is burdensome on any entities, we work with those entities to minimize that burden in a way that is acceptable to both parties. I do not think that Wealth Assistants has standing to raise the objection that the subpoenas are unduly burdensome. However, if you would like to have a discovery conference with Judge Kim, I would be happy to do so. Here are the requirements for such a conference posted on his website:

1. Informal Discovery Conferences: With the agreement of the parties, the Court may in its discretion conduct informal (telephonic or video)

conferences to resolve discovery disputes outside the formal Local Rule 37 procedures. Before any such informal conference, however, the parties must engage in at least two attempts to resolve the dispute without court involvement consistent with the pre-filing conference of counsel required by Local Rule 37-1. If after two meet-and-confer attempts, the parties reach an impasse and agree to an informal telephonic conference with the Court, the moving party should email (with a cc to the opposing party) the completed form entitled "Request for Informal Discovery Conference" (available for download below), to the CRD, providing the following information: (a) at least three proposed dates and times, agreeable to the parties, for the telephonic conference; (b) a brief, neutral statement of the discovery dispute and the specific relief requested; (c) a brief summary of the parties' respective positions; and (d) the two dates of the parties' meet-and-confer efforts to resolve the dispute without court intervention. After its review of the email request, the Court will schedule the informal conference if appropriate or advise the parties to proceed by motion under Local Rule 37-2.

Thanks,

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